

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS**

<b>In re:</b>  <b>WELCOME GROUP 2, LLC, <i>et al.</i>,<sup>1</sup></b>  <b>Debtors.</b>	* * * * *	<b>Case No. 2:23-bk-53043</b>  <b>Chapter 11</b> <b>Judge Mina Nami Khorrami</b>  <b>Jointly Administered</b>
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**NOTICE OF DEBTORS/DEBTORS-IN-POSSESSION'S MOTION FOR ORDER  
EXTENDING DEBTORS' EXCLUSIVE PERIODS TO FILE AND SOLICIT  
ACCEPTANCES OF A PLAN OF REORGANIZATION**

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The above-captioned Debtors and Debtors-In-Possession (collectively the "Debtors") have filed a Motion for Order Extending Debtors' Exclusivity Period to File a Plan of Reorganization, a copy of which is attached hereto.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to grant the Motion, then on or before **twenty-one (21) days from the date set forth in the Certificate of Service for the Application**, you must file with the Court a response explaining your position by mailing your response by regular U.S. Mail to:

**U.S. Bankruptcy Court, 170 North High Street, Columbus, Ohio 43215**

OR your attorney must file a response using the Court's ECF system.

If you mail your request and response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also send a copy of your response either by 1) the Court's ECF system or 2) regular U.S. Mail to:

**Thomsen Law Group, LLC, Counsel for Debtor, 140 North Main Street, Suite A,  
Springboro, OH 45066**

**Office of the U.S. Trustee, 170 North High Street, Columbus, OH Suite 200, 43215**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief without further hearing or

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<sup>1</sup> The Debtors and the last four digits of their federal tax identification numbers are as follows: Welcome Group 2, LLC (6795), Hilliard Hotels, LLC (6063), and Dayton Hotels, LLC (1123). The Debtors' headquarters are located at 5955 E. Dublin Granville Road, New Albany, Ohio 45305.

notice.

Date of Service: December 1, 2023

/s/ Darlene E. Fierle

Darlene E. Fierle (0081217)

Denis E. Blasius (0082617)

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*Counsel for Debtors and Debtors-In-Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS**

<b>In re:</b>	*	<b>Case No. 2:23-bk-53043</b>
	*	
<b>WELCOME GROUP 2, LLC, <i>et al.</i>,<sup>2</sup></b>	*	<b>Chapter 11</b>
	*	<b>Judge Mina Nami Khorrami</b>
<b>Debtors.</b>	*	
	*	<b>Jointly Administered</b>

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**DEBTORS' AND DEBTORS-IN-POSSESSION'S MOTION FOR ORDER EXTENDING  
DEBTORS EXCLUSIVE PERIODS TO FILE AND SOLICIT ACCEPTANCES  
OF A PLAN OF REORGANIZATION**

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COME NOW The above-captioned Debtors and Debtors-In-Possession (collectively the "Debtors"), by and through counsel, and pursuant to 11 *U.S.C.* §1121(d), respectfully requests that this Court extend the exclusivity deadline for filing a plan of reorganization in 11 *U.S.C.* §1121(d) up to and including February 29, 2024. A Memorandum in support of this Motion is set forth below.

Date: December 1, 2023

Respectfully submitted,

/s/ Darlene E. Fierle

Darlene E. Fierle (0081217)

Denis E. Blasius (0082617)

Ira H. Thomsen (0023965)

Thomsen Law Group, LLC

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*Counsel for Debtors and Debtors-In-Possession*

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<sup>2</sup> The Debtors and the last four digits of their federal tax identification numbers are as follows: Welcome Group 2, LLC (6795), Hilliard Hotels, LLC (6063), and Dayton Hotels, LLC (1123). The Debtors' headquarters are located at 5955 E. Dublin Granville Road, New Albany, Ohio 45305.

**MEMORANDUM IN SUPPORT**

1. On September 1, 2023 (the “Petition Date”), the Debtors filed their voluntary petitions for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of Ohio, Eastern Division.

2. The Debtors continue to manage their businesses as a Debtors-in-Possession pursuant to 11 U.S.C. §§1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Debtors’ case.

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. This is a core proceeding pursuant to 28 U.S.C. §157(b). The venue of this chapter 11 case and this Motion is proper pursuant to 28 U.S.C. §§1408 and 1409.

4. Under 11 U.S.C. §1121(b), only the Debtors may file a plan until 120 days after the Petition Date (the “Exclusivity Period”). The Exclusivity Period deadline for debtors to file a plan of reorganization in the instant proceeding under 11 U.S.C. §1121(b) expires on December 30, 2023.

5. Given the twenty-one (21) day notice period required under the Bankruptcy Rules this Motion is being filed so that the Order extending the Exclusivity Period can be signed on or before December 30, 2023. A Proposed Order is appended to this Motion. THE DEBTORS RESPECTFULLY REQUEST THAT THE COURT SET A HEARING ON THIS MOTION ON OR BEFORE DECEMBER 30, 2023, TO BE VACATED IF NO RESPONSE HERETO IS FILED.

6. The Debtors have a high degree of confidence that a plan of reorganization will be and can be confirmed. Further, the extension granted herein would fall well within the 18 months of exclusivity under 11 U.S.C. §1121(d)(2)(B).

7. No previous extensions of the Exclusivity Period has been requested.

8. No prejudice will be suffered by parties-in-interest as a result of an extension of the Exclusivity Period requested herein. The proposed extension is being requested in good faith and is in the best interests of the estate.

**WHEREFORE**, Debtors Welcome Group 2, LLC, Dayton Hotels, LLC, and Hilliard Hotels, LLC respectfully requests that the Court extend the Exclusivity Period up to and including February 29, 2024 and set a hearing on this Motion on or before December 30, 2023 to be vacated if no response to this Motion is filed and such other and further relief as the Court deems just and proper.

Date: December 1, 2023

Respectfully submitted,

/s/ Darlene E. Fierle

Darlene E. Fierle (0081217)

Denis E. Blasius (0082617)

Ira H. Thomsen (0023965)

Thomsen Law Group, LLC

140 North Main Street, Suite A

Springboro, Ohio 45066

937-748-5001

dfierle@ihtlaw.com

*Counsel for Debtors and Debtors-In-Possession*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 1, 2023, a copy of the foregoing ***Debtors' and Debtors-In-Possession's Motion for Order Extending Debtors' Exclusivity Period to File a Plan of Reorganization*** was served on all registered ECF participants, electronically through the court's ECF System at the e-mail address registered with the court and by regular U.S. Mail, postage prepaid, upon the following:

The Largest Twenty (20) Unsecured Creditors Listed below:

AEP OH  
P.O. Box 371496  
Pittsburgh, PA 15250-7496

AES OH  
P.O. Box 2631  
Dayton, OH 45401-2631

Hilton  
755 Crossover Lane  
Memphis, TN 38117

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Onity, Inc.  
4001 Fairview Industrial Drive SE  
Salem, OR 97302

Site Search, LLC  
55 Buttercup Court  
Marco Island, FL 34145

Best Western International, Inc.  
P.O. Box 842700  
Los Angeles, CA 90084-5080

Columbia Gas of Ohio, Inc.  
290 W. Nationwide Blvd, Unit 114  
Columbus, Ohio 43215

Mailender  
P.O. Box 23158  
New York, NY 10087-3158

Charter Communications  
P.O. Box 6030  
Carol Stream, IL 60197-6030

Montgomery County Board of Comm.  
451 W Third St.  
Dayton, OH 45422

Montgomery County Envir.  
1850 Spaulding Rd.  
Kettering, OH 45432

Sysco - Cincinnati  
10510 Evendale Dr.  
Cincinnati, OH 45241

U.S. Foods, Inc.  
9399 W. Higgins Road, Suite 100  
Rosemont, IL 60018

Direct TV  
2260 E. Imperial Hwy.  
El Segundo, CA 90245

Montgomery County  
Convention Fac  
22 E. 5th Street  
Dayton, OH 45402

Muskingum County Convention  
ATTN: Downtown CSR  
113 N. 5th St.  
Zanesville, OH 43701

Expedia  
P.O. Box 844120  
Dallas, TX 75284-4120

Muskingum County Board of  
Commissioners  
401 Main Street  
Zanesville, OH 43701

Muskingum County Utilities  
375 Richards Rd.  
Zanesville, OH 43701

Washington Township Trustees  
8200 McEwen Road  
Dayton, OH 45458

U.S. Small Business  
Administration  
200 W. Santa Blvd., Suite 740  
Santa Ana, CA 92701

Ohio Dept. of Taxation  
ATTN: Bankruptcy Division  
30 E. Broad Street, 21st Fl.  
Columbus, OH 43215

A.C.E.  
7715 Northwest 22nd Avenue - 312  
Miami, FL 33147

Ohio Bureau of Workers'  
Compensation  
30 W. Spring St.,  
Columbus, OH 43215-2256

Wilson Memorial Hospital  
915 W. Michigan St.  
Sidney, OH 45365

Epro Services  
1491 Polaris Parkway, #217  
Columbus, OH 43240

Gordon Food Services, Inc.  
P.O. Box 88029  
Chicago, IL 60680-1029

Donnellon McCarthy  
10855 Medallion Drive  
Cincinnati, OH 45241

Miracle Method of Columbus  
1575 Integrity Drive E  
Columbus, OH 43209

DeBra Kuempel  
P.O. Box 701620  
Cincinnati, OH 45270

Otis Elevator  
321 S. Main Street  
Dayton, OH 45402

The Ohio Painting Company  
3040 S. Tech Blvd.  
Miamisburg, OH 45342

Servicemaster  
1524 E. 2nd Street  
Dayton, OH 45403

Mega City Fire & Security  
8210 Expansion Way  
Dayton, OH 45424

City of Sidney – Utility  
201 W. Poplar Street  
Sidney, Ohio 45365

IGEL  
2040 Alum Creek Drive  
Columbus, Ohio 43207

City of Sidney  
201 W. Poplar Street  
Sidney, Ohio 45365

A+ Lawn care  
3970 New Riley Road  
Dresden, OH 43821

/s/ Darlene E. Fierle

Darlene E. Fierle (0081217)

*Counsel for Debtors/Debtors-In-Possession*

**PROPOSED ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS**

<b>In re:</b>	*	<b>Case No. 2:23-bk-53043</b>
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<b>WELCOME GROUP 2, LLC, <i>et al.</i>,<sup>3</sup></b>	*	<b>Chapter 11</b>
	*	<b>Judge Mina Nami Khorrami</b>
<b>Debtors.</b>	*	
	*	<b>Jointly Administered</b>

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**ORDER EXTENDING DEBTORS' AND DEBTORS-IN-POSSESSION'S EXCLUSIVE PERIODS  
TO FILE AND SOLICIT ACCEPTANCES OF A PLAN OF REORGANIZATION**

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This matter came on before the Court on the Debtors' and Debtors-In-Possession's Motion for an Order Extending Exclusivity Period to file a Plan of Reorganization (*Doc. \_\_\_\_*) (the "Motion"), and the Court has reviewed the Motion and finding good cause to grant the relief requested thereto approves same.

It is therefore

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<sup>3</sup> The Debtors and the last four digits of their federal tax identification numbers are as follows: Welcome Group 2, LLC (6795), Hilliard Hotels, LLC (6063), and Dayton Hotels, LLC (1123). The Debtors' headquarters are located at 5955 E. Dublin Granville Road, New Albany, Ohio 45305.



ORDERED that the Exclusivity Period<sup>4</sup> deadline for the Debtors to file plan of reorganization is hereby extended up to and including February 29, 2024.

**IT IS SO ORDERED.**

Copies to:

Default List Plus Top 20

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<sup>4</sup> Unless otherwise defined herein, all capitalized terms shall have the meaning ascribed to them in the Motion.